1	The Honorable Barbara J. Rothstein		
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7	UNITED STATES DISTRICT COURT		
8	WESTERN DISTRICT OF WASHINGTON AT SEATTLE		
9	PAWANDEEP DHUNNA,) No.: 2:21-cv-00720-BJR		
10	Plaintiff,) STIPULATED MOTION AND ORDER TO		
11	vs.) STAY LITIGATION		
12	DEPARTMENT OF HOMELAND)		
13	SECURITY, et al.,		
14	Defendants.		
15	Plaintiff Pawandeep Dhunna and Defendants the Department of Homeland Security, et al.		
16	through their respective counsel, jointly stipulate and move to continue to stay this litigation unt		
17	October 31, 2022. The parties submit there is good cause to continue to stay the litigation.		
18	In this litigation, Plaintiff seeks an order compelling U.S. Citizenship and Immigration		
19	Services ("USCIS") to adjudicate his I-526 petition. USCIS issued a Request for Evidence		
20	("RFE") to Plaintiff on May 6, 2022. Plaintiff has until September 30, 2022, to respond to the		
21	RFE. Once this response is received, USCIS can continue to process Plaintiff's I-526 petition. T		
22	provide Plaintiff with the necessary time to respond and for USCIS to review the response, the		
23	parties agree that staying the litigation until October 31, 2022, is appropriate. Accordingly, the		
24	STIPULATED MOTION AND ORDER 2:21-cv-00720-BJR Page 1 UNITED STATES ATTORNEY 700 STEWART STREET, SUITE 5220 SEATTLE, WASHINGTON 98101 (206) 553-7970		

1	parties respectfully request that this Court continue the stay and allow them to file a joint status	
2	report on or before October 31, 2022.	
3	IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.	
4	DATED 11 12 2022	
5	DATED: July 12, 2022	ANDREW JACOB HAYES
6		WSBA #45605 Millar & Hayes, PC
7		2633 Eastlake Avenue E., Suite 300 Seattle, WA
8		Phone: 206.262.0561 andrewh@usborderlaw.com
9		Attorney for Plaintiff
10		
11	DATED: July 12, 2022	NICHOLAS W. BROWN
12		United States Attorney
13		s/ Michelle R. Lambert MICHELLE R. LAMBERT, NYS#466657 Assistant United States Attorney
14		United States Attorney's Office 1201 Pacific Avenue, Suite 700
15		Tacoma, WA 98402 Phone: (253) 428-3824
16		Email: michelle.lambert@usdoj.gov Attorney for Defendants
17		Attorney for Defendants
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	STIPULATED MOTION AND ORDER	UNITED STATES ATTORNEY 700 STEWART STREET, SUITE 5220

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ORDER IT IS SO ORDERED. Dated this 18th day of July, 2022. Barbara & Rotherein The Honorable Barbara J. Rothstein United States District Court Judge

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